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August 16, 2022

Via ECF

Honorable Naomi Reice Buchwald
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

RE: *Federal National Mortgage Association v. Barclays Bank PLC, et al.*,
No. 13-cv-7720 (NRB)

In re LIBOR-Based Financial Instruments Antitrust Litig., No. 11-md-2262 (NRB)

Dear Judge Buchwald:

We write on behalf of the Federal National Mortgage Association (“Fannie Mae”) regarding today’s deadline for filing pre-motion letters seeking leave to amend, including to add or drop parties. [ECF No. 3425, 7/5/22 Scheduling Order.]

Fannie Mae proposes to amend its complaint to correct its allegations regarding two panel-banks entities. First, Fannie Mae seeks to add Credit Suisse AG as the panel bank and to drop Credit Suisse Group AG, which Fannie Mae incorrectly alleged was the panel bank. Second, Fannie Mae seeks to allege that The Royal Bank of Scotland plc, which is already a party, was the panel bank. In connection with this amendment, Fannie Mae would drop The Royal Bank of Scotland Group, plc, which it incorrectly alleged was the panel bank.

Fannie Mae has conferred with counsel for Credit Suisse and RBS, and they do not oppose Fannie Mae’s proposal to name the correct panel-bank entities.¹ While the parties have cooperatively and diligently discussed the appropriate procedure to effect these substitutions, the parties need additional time to complete these discussions.

¹ Counsel for Bank of America and UBS advised that they do not oppose Fannie Mae’s request to correct its panel-bank allegations regarding Credit Suisse and RBS.

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Accordingly, Fannie Mae requests an extension until August 31, 2022 to file pre-motion letters seeking leave to amend, including to add or drop parties. Credit Suisse and RBS consent to this request.

Respectfully,

/s/ Sam W. Cruse III

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cc: All Counsel of Record (by Electronic Filing)